



# CODE OF CONDUCT

DOING THE RIGHT THING



APRIL 2019

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## DEAR COLLEAGUES

*Among the many things that unite all of us working for Lundbeck, two are fundamental. Our dedication to restoring brain health so every person can be their best and our commitment to act in accordance with our Code of Conduct.*

I believe that what we do and how we do it is equally important.

The Code of Conduct is our common point of reference for deciding how ethical or compliance matters should be handled. It defines our global ethical standard and is built on a two-handed commitment between Lundbeck and our employees.

You are expected to follow the Code of Conduct as well as current regulation, and act with diligence, when you make ethical considerations. Equally, I promise that Lundbeck will offer you the conditions you need to comply. These include updated procedures, annual training on the Code of Conduct and access to advice.

Lundbeck's people managers play a vital role here. They are asked to act as role models and support their employees in understanding how compliance initiatives are translated into practice locally.

I encourage anyone who is concerned about breaches of the Code of Conduct to discuss these with their colleagues or manager. Seek advice in the relevant Corporate Function and if needed use Lundbeck's Compliance Hotline to raise concerns in good faith.

Please join me in these continuous efforts to uphold Lundbeck's long-standing reputation as a respected and responsible pharmaceutical company.



Deborah Dunsire  
PRESIDENT AND CEO OF LUNDBECK

# LUNDBECK'S COMPLIANCE STRUCTURE

*Documents, training, monitoring and governance are the active elements in our Compliance Structure that is established to ensure we are doing the right thing, continually improve processes and sustain a compliance culture.*



As the top-level document, the Code of Conduct conveys Lundbeck's commitments and the expectations to our employees for areas that are critical to the pharmaceutical industry. All employees and Third Parties working on our behalf are obliged to observe the Code of Conduct, and adhere to local regulations or standards when they are stricter than the Code of Conduct.

The global and local procedures below the Code of Conduct contain more operational requirements and good practices. We maintain a GxP quality management system in relevant areas to control risks, continually improve our processes and meet regulatory expectations.

We want to make sure that the requirements are understood and the relevant parties know how to act. All employees are annually requested to complete the corporate Code of Conduct training. We continuously communicate to maintain awareness and engage our employees in training activities.

Our monitoring efforts aim to validate the understanding of the requirements and capture suggestions for improvements of processes and controls. Our auditors provide feedback with corrective and preventive actions to ensure local management ownership and follow-up.

Lundbeck's Code of Conduct Compliance Committee represents Executive Management and relevant business functions. They meet regularly to maintain oversight and once yearly perform

the Code of Conduct risk management review to initiate needed improvements. Further, the Chief Compliance Officer provides relevant updates at meetings in the Board of Directors' Audit Committee.

## **JOIN THE CONVERSATION ON ETHICS, SEEK ADVICE AND REPORT RELEVANT CONCERN**

We encourage everyone to have ongoing dialogue on compliance and ethics with their colleagues and manager. However, we realise that some questions, dilemmas or concerns might not be discussed openly.

Seek advice if you are uncertain of how to act or concerned that a matter is not being properly addressed. Contact the relevant Corporate Function e.g. HR, Finance, Legal or Compliance.

You can always report serious compliance concerns in full confidentiality to Lundbeck's Compliance Hotline. Anyone who raises a concern in good faith is protected by Lundbeck's non-retaliation policy. Please remember you may be violating the Code of Conduct, if you know of a breach and fail to report it.

# DEFINITIONS

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*Please note that the definitions in the Code of Conduct are global and that these may vary from local definitions. You are expected to assess whether the local definitions have any bearing on adherence to the Code of Conduct and local regulations that are stricter than the Code of Conduct.*

## A

**ADVERSE EVENT:** any untoward medical occurrence in a patient or Clinical Study Subject of a medicinal product, which does not necessarily have a causal relationship with the treatment. An Adverse Event can therefore be any unfavourable and unintended sign, symptom or disease temporally associated with the use of a medicinal product, whether or not considered related to the medicinal product.

or other effects of an investigational product, or to identify any adverse reactions to an investigational product, or to study absorption, distribution, metabolism, and excretion of an investigational product with the object of ascertaining its safety or efficacy.

**CONFIDENTIAL INFORMATION:** Business sensitive or critical information about e.g. products, processes, operations, production, sales or customers of which the unauthorised disclosure could cause damage to our interests or the interests of the party that the information pertains to.

**CONFLICT OF INTEREST:** A situation where the personal interests of an individual collide or potentially could collide with the interests of the company they represent or their roles and responsibilities in that company.

**COUNTERFEIT MEDICINE:** A product manufactured or sold with the intent to deceptively represent its origin, authenticity or effectiveness or a product that is deliberately and fraudulently altered in any way. A counterfeit case may include information about counterfeit or suspected Counterfeit Medicine, illegally diverted or stolen medicine.

## B

**BRIBERY:** Means to offer, promise, give or receive any undue pecuniary or other advantage, whether directly or through intermediaries, to obtain or retain business or other improper advantage. This includes Kickbacks that are one of the most common forms of government Bribery.

## C

**CLINICAL DATA:** Information on and the results of all interventional clinical phase I – IV studies.

**CLINICAL STUDY:** Any investigation in human subjects intended to discover or verify the clinical, pharmacological

## D

**DATA PROTECTION OFFICER:** The Lundbeck appointed employee with expert knowledge on Personal Data laws and practices.

**DOMINANT POSITION:** Describes a company with economic strength on a market, which enables it to hinder the maintenance of effective competition by allowing it to behave

appreciably independent of its competitors, customers and ultimately of consumers.

**DONATION:** A voluntary contribution provided without receiving any benefit, compensation, favour or advantage in return.

**DUE DILIGENCE SCREENING:** An examination of publicly available sources to identify potential risks related to potential or existing Third Parties.

# E

**ELIGIBLE RECIPIENT:** Legal entities or individuals who have no Conflict of Interest with Lundbeck and meet the ethical and legal standards that Lundbeck asks business partners to uphold. Individual Healthcare Professionals, political parties or religious organisations are not eligible to receive Donations or Grants from Lundbeck.

**EVENTS:** Symposia, congresses and other promotional, scientific or professional meetings e.g. advisory board meetings, roundtables, continuing medical education or other organised exchanges of knowledge.

# F

**FACILITATION PAYMENTS:** Illegal, non-official, small value payments, Gifts or fees paid to Public Officials to speed up the delivery of a routine task or services that are part of their duties e.g. a customs officer stamping a customs form.

**FAIR MARKET VALUE:** A reasonable amount paid for the performed services that represents what would have been paid based on arms-length negotiations.

**FRAUD:** Generally means acting dishonestly or deceptively

with the intention of obtaining an undue benefit, to avoid an obligation, to cause a loss to another party or to illegally move funds.

# G

**GIFTS:** Items that are given without getting anything in return.

**GRANT:** Financial support provided to an organisation or a third party, dedicated to supporting specific purposes or activities. Educational Grants can support e.g. continuing medical education or development of educational materials for scientific conferences and professional meetings, provided such education or materials are non-promotional in nature and do not provide Lundbeck with any benefit or value. Research Grants can support an organisation or a specific study or research project, if the supported research does not provide Lundbeck with any benefit or value besides the published data.

**GXP:** Good Practices including Good Laboratory Practice (GLP), Good Clinical Practice (GCP), Good Manufacturing Practice (GMP), Good Distribution Practice (GDP) and Good Pharmacovigilance Practice (GPvP).

# H

**HEALTHCARE ORGANISATION:** Any legal entity that is a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university, teaching institution or any entity through which one or more Healthcare Professionals provide services.

**HEALTHCARE PROFESSIONAL:** Any member of the medical, dental, pharmacy or nursing professions or any other person, who in the course of his or her professional activities may recommend, prescribe, purchase, supply or administer a medicinal product.

# I

**INFORMATIONAL AND EDUCATIONAL ITEMS:** Electronic or printed materials that are relevant to the practice of medicine or pharmacy and enhance the care of patients.

**INSIDE INFORMATION:** Information about Lundbeck or other companies with which we are doing business or negotiating that is not generally known to the public, but would likely, if known, affect the price of Lundbeck's or another company's shares or influence people's decisions to invest in Lundbeck's or another company's shares.

**INVESTIGATOR:** Person responsible for the conducting the Clinical Study at a study site. If a study is conducted by a team of individuals at a study site, the Investigator is the responsible leader of the team and may be called the principal Investigator.

medicines given free of charge in accordance with applicable regulations to authorized Healthcare Professionals with the purpose of promoting the product and enhancing patient care. Medicinal Product Samples are marked as such so that they cannot be resold or otherwise misused.

# O

**OFF-LABEL:** Means the use of a medicinal product for an indication, in a dosage form, in a dose regimen, for a population or other use parameter that is inconsistent with the labelling approved by the relevant Regulatory Authority.

# P

**PATIENT ORGANISATION:** A non-profit organisation, including umbrella organisations to which they belong, mainly composed of patients or caregivers that represent or support the needs of patients or caregivers.

**PERSONAL DATA:** Any information related to a person that can be directly or indirectly linked to that person.

**PERSONAL SOCIAL MEDIA ACTIVITIES:** Refer to the use of a personal social media account for non-Lundbeck business purposes.

**PHARMACOVIGILANCE:** The science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other medicine-related problem.

**PRODUCT LABEL:** The approved position and unique identification of a medicinal product as distilled by the competent authority. It is the definitive statement between the competent authority and the Marketing Authorisation holder. It represents the official documentation of the approved indication and permitted conditions of use of the product.

# L

**LUNDBECK MEDICINAL PRODUCT:** A drug product or finished dosage form that contains a drug substance, approved by the competent authority for commercial use in humans for the treatment or prevention of a disease, to which Lundbeck holds a valid Marketing Authorisation and commercialisation rights.

# M

**MARKETING AUTHORISATION:** An approval or a licence issued by a Regulatory Authority. Such approval or licence is required before any medicinal product can enter the market.

**MEDICINAL PRODUCT SAMPLES:** Small supplies of

**PROMOTION:** Any activity undertaken, organised or sponsored by or on behalf of a pharmaceutical company, which is intended to promote the prescription, supply, sale, administration, recommendation or consumption of its medicinal products. Also, providing non-promotional information in a promotional context, e.g. presenting strictly scientific information or disease awareness at a promotional event, may be considered Promotion.

**PROMOTIONAL AID:** Labelled item e.g. a pen or a note pad that aim to remind the recipient of a specific medicinal product.

**PUBLIC OFFICIAL:** Include public or civil servants, regulators or representatives of public authorities, elected officials, government or state officials.

## Q

**QUALITY RESPONSIBLE PERSON:** Typically a licensed pharmacist or similar with several years pharmaceutical manufacturing experience, responsible to certify that the quality of medicinal products complies with the Marketing Authorisation.

## R

**REGULATORY AUTHORITY:** A governmental body responsible for the approval and surveillance of medicinal products.

## S

**SPECIAL SITUATIONS:** Include pregnancy, breast feeding, lack of drug effect, overdose, misuse, abuse, medication errors, interactions, Off-label use including use in unapproved age group (paediatric exposures), transmission of an infectious agent, occupational and accidental exposures, withdrawal reactions, counterfeit products, complaint cases or product quality issues with Adverse Events.

**STAKEHOLDERS:** Any member of society that you interact with as part of your work such as Healthcare Professionals, Healthcare Organisations, patients and Patient Organisations, Public Officials, payers, Suppliers, scientific and business partners.

**STUDY SUBJECT:** An individual who participates in a Clinical Study, either as a recipient of the investigational products or as a control.

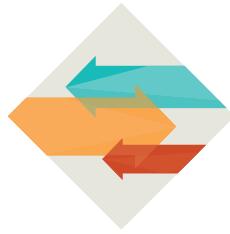
**SUPPLIER:** Legal entity that invoices Lundbeck directly or indirectly for a product or service.

## T

**THIRD PARTIES:** Professionals and entities performing activities within Lundbeck's core business areas either on behalf of or in the material interest of Lundbeck.

**TOKEN VALUE:** A modest value provided without expecting anything in return and that does not result in a Conflict of Interest.

**TRANSFER OF VALUE:** Any direct or indirect payment or other item of value provided to a Healthcare Professional or Healthcare Organisation as a fee for service, meals, accommodation, travel, Informational or Educational Items, or participation in events and meetings.



# RESPONSIBLE AND TRANSPARENT INTERACTIONS

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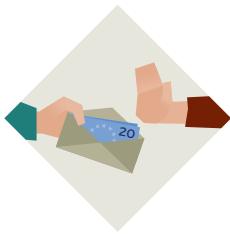
*We engage with Stakeholders as part of our business and because it is essential for us to understand their expectations, needs and concerns in regard to our activities and the related impact on society. These interactions are kept appropriate, transparent and free of any undue influence or Conflict of Interests.*

## LUNDBECK WILL ENSURE THAT

- Our employees and Third Parties are instructed to act in accordance with local laws and our Code of Conduct.
- Communication guidelines are maintained and relevant employees receive training in these.
- Clear guidelines and training is provided on the regulatory and reputational restrictions of our employee's Personal Social Media Activities.
- Systems and procedures enable a safe use of IT and awareness campaigns are conducted to prevent misuse and cybercrime.
- Our employees act with professionalism and safeguard the integrity of our Stakeholders.
- Our employees understand the need to perform their work without Conflict of Interests.
- Relevant principles and processes are available to allow necessary, legitimate and mutually beneficial interactions with Public Officials.
- We maintain processes and systems to ensure that Lundbeck's books and records are accurate and sufficiently detailed.
- Our tax policy, local tax laws and regulations are observed when establishing collaborations and conducting business.

## YOU ARE EXPECTED TO

- Introduce yourself to Stakeholders by name and state your relation to Lundbeck when you represent Lundbeck.
- Keep your communication factual, specific and precise, and avoid misleading statements making unqualified judgements or speculations.
- Observe Lundbeck's guidelines for Personal Social Media Activities.
- Think before you act on mails from unknown sources and report suspected fraudulent or phishing mails to [infosec@lundbeck.com](mailto:infosec@lundbeck.com).
- Take due care that your interactions with Stakeholders have a professional purpose, are kept appropriate and free of any undue influence.
- Never engage in any relationship that could create a Conflict of Interest and immediately notify your manager, if you find yourself in a Conflict of Interest.
- Only interact with Public Officials when this is necessary, legitimate and mutually beneficial, ensure that the integrity of the Public Official is respected and that any provided hospitality, travel arrangements and other Transfers of Value are legal and kept reasonable.
- Follow Lundbeck procedures and local laws for reporting, taxation and accounting.



# ANTI-CORRUPTION

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*We believe that integrity and fairness should be reflected in all our activities, and we will work against corruption in any form. We do not accept corrupt activities, whether committed by our employees or by Third Parties acting on our behalf.*

## LUNDBECK WILL ENSURE THAT

- Systems and controls are in place to prevent Fraud against Lundbeck, any of our partners or government entities.
- Our employees and Third Parties are familiar with and follow procedures to avoid Bribery.
- All suspected incidents of Fraud and Bribery are thoroughly investigated and appropriate actions are taken.
- Business decisions taken by our own employees are not influenced by Gifts or other benefits from business partners.
- Procedures are in place to establish whether the provision of Gifts or other benefits of a Token Value is permissible and if so, to define the local Token Value limit.

## YOU ARE EXPECTED TO

- Ensure that you do not engage directly or indirectly in Fraud against Lundbeck, any of our partners or government entities.
- Follow Lundbeck's principles and procedures when using or releasing funds, approving and documenting cost, including segregation of duties and one-over-one approval.
- Ensure that you do not engage directly or indirectly in Bribery or Kickback to Public Officials, prescribers, Healthcare Organisations or any other party with which Lundbeck does business.
- Only provide Gifts or other benefits of a Token Value to Stakeholders and ensure they are permitted to receive these under local laws and regulations.
- Refuse to pay any bribes or Facilitation Payments.
- If a bribe is demanded, immediately report the incident to your manager.
- Only accept Gifts or other benefits of a Token Value from Stakeholders, if this is permitted under local laws and regulations.
- Know the locally defined Token Value limit.



# SUPPLIER AND THIRD PARTY OBLIGATIONS

*We apply systematic procedures aimed at respecting human rights and labour rights, ensuring environmental protection and preventing corruption when engaging Suppliers and Third Parties. They are obligated to meet legal and ethical requirements and we monitor their performance.*

## LUNDBECK WILL ENSURE THAT

- Processes for procurement and for engaging Suppliers and Third Parties are established and that our employees receive appropriate training.
- Third Parties are subjected to a systematic, timely and risk-based Due Diligence Screening that complies with applicable laws and regulations.
- Suppliers in general are obligated to adhere to the UN Global Compact principles, while Third Parties specifically are obligated to adhere to the principles of Lundbeck's Code of Conduct.
- Commitments made by Lundbeck under an agreement with Suppliers and Third Parties are fulfilled.
- We have an ongoing and open dialogue with our Suppliers and Third Parties, including when we monitor their performance of obligations under the agreement with Lundbeck.

## YOU ARE EXPECTED TO

- Hire Suppliers and Third Parties based on clearly identified, legitimate needs, objective selection criteria and avoid any Conflict of Interests.
- Follow Lundbeck's processes for procurement and use the Suppliers that are approved by Lundbeck when possible.
- Ensure that a Due Diligence Screening of Third Parties is performed in accordance with Lundbeck's global procedure.
- Use agreements containing Lundbeck's standard requirements where possible and ensure that Suppliers and Third Parties are obligated to adhere to the UN Global Compact principles and the principles of Lundbeck's Code of Conduct respectively.
- Ensure the commitments made to the Suppliers or Third Parties that you are responsible for are being fulfilled.
- Maintain an open dialogue with Suppliers and Third Parties to create trust and continuously improve the collaboration.
- Ensure the Suppliers or Third Parties you are responsible for are subjected to adequate monitoring activities.



# HUMAN RESOURCES

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*We support diversity in our workforce and promote learning and development at an organisational, team and individual level. We believe that respect for the individual is the foundation of a high performing company.*

## LUNDBECK WILL ENSURE THAT

- Our human resources (HR) policies and procedures comply with applicable laws and regulations.
- Diversity among our employees and managers is supported, valued and used as an asset in our innovative and learning environment.
- Respect for each employee's integrity is maintained and that discrimination and harassment are never accepted.
- Each of our employees has the opportunity to develop the competencies that are necessary to achieve the expected results.
- Recruitment, acknowledgement and recognition are based entirely on personal abilities, performance, potential and behaviour.
- No unethical exploitation of employees takes place and that all employees are free to join groups that serve their occupational interests.

## YOU ARE EXPECTED TO

- Be familiar and comply with Lundbeck's HR approach as expressed in this Code of Conduct.
- Treat others with decency and show respect for differences, varying ideas and perspectives among your colleagues.
- Promote a positive and inclusive work environment that is free from discrimination and harassment.
- Take an active part in the development of your professional skills and competencies.
- Offer and ask for feedback to promote learning for yourself as well as for your colleagues.
- Challenge the status quo, make suggestions for change and be adaptive.
- Report concern to your immediate manager or your HR manager about behaviour that does not comply with this Code of Conduct.



# HEALTH, SAFETY AND ENVIRONMENT

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*We provide a sound working environment for our employees and we act responsibly to minimise our impact on the environment. We promote continuous improvements through cooperation between managers and employees with support from specialists who provide knowledge and effective solutions.*

## LUNDBECK WILL ENSURE THAT

- Our Health, Safety and Environment (HSE) policy, strategy and procedures as a minimum comply with applicable laws and regulations.
- Our employees have the working conditions and knowledge that are required to carry out their jobs in a healthy and safe manner, and to minimise the impacts on the environment.
- HSE considerations are made systematically when establishing new facilities, developing new products, changing organisation or processes.
- Results of regular surveys and monitoring of HSE aspects are used to define new areas of improvements.
- We communicate openly about our HSE performance, our challenges and successes to inspire and share experiences among our employees and other Stakeholders.

## YOU ARE EXPECTED TO

- Participate in training activities to understand your part in fulfilling Lundbeck's HSE policy.
- Understand and follow Lundbeck's requirements to effectively manage the significant HSE aspects related to your job.
- Act in a safe and prudent manner.
- Actively participate in surveys and support solutions to improve physical and psychological working conditions.
- Take an active part in protecting the environment by reducing waste and minimising consumption of energy and other resources.
- Consider HSE risks related to your job and immediately inform your manager about any actual or potential HSE concerns or incidents.



# PERSONAL DATA

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*We are committed to safeguarding Personal Data of patients, research and business partners and our employees. We will collect, process and retain Personal Data in accordance with legal requirements in a transparent and secure way that protects the privacy of the individual.*

## LUNDBECK WILL ENSURE THAT

- Policies and procedures are in place to help our employees process Personal Data in accordance with applicable regulations.
- Our employees have access to competent advice on handling of Personal Data.
- Procedures are in place to handle Personal Data breaches and objections or requests from individuals if this is required by local laws and regulations.
- IT systems are designed and configured to meet the required security standards and include the functionalities necessary for Personal Data compliance.
- A Data Protection Officer is appointed to inform and advise Lundbeck of its obligations and monitor compliance in accordance with relevant Personal Data regulations.

## YOU ARE EXPECTED TO

- Understand and observe Lundbeck's Data Privacy policies and procedures, local laws and regulations related to protecting Personal Data.
- Only collect, process, disclose or retain Personal Data if it has a legitimate business purpose and is permitted by local laws and regulations.
- Make sure that individuals are duly notified of Lundbeck's handling of their Personal Data if this is required by local laws and regulations.
- Ensure the necessary agreements are in place before, collecting, processing or transferring personal data to Third Parties.
- Delete Personal Data in accordance with Lundbeck's established retention periods and procedures.
- Handle objections or requests regarding Lundbeck's processing of their Personal Data without undue delay and in accordance with local laws and regulations.



# FAIR AND OPEN COMPETITION

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*We are committed to the principle of fair, free and efficient competition. We work to ensure competition law compliance to preserve and protect free and open competition and avoid abusive behaviour that may restrain competition.*

## LUNDBECK WILL ENSURE THAT

- We implement and maintain effective competition compliance policies and procedures throughout our business.
- Relevant Lundbeck employees are trained to comply with competition law and respond appropriately to requests or inspections by the competent authorities.
- We promote an understanding of and compliance with competition law throughout our value chain.

## YOU ARE EXPECTED TO

- Never restrain competition through unlawful agreements, arrangements or understandings that restrict competition.
- Bid for contracts and tenders independently from and without any agreement or arrangement with our competitors.
- Never exchange with actual or potential competitors non-public information about prices, pricing methods, sales strategies, business opportunities, profits, costs, research and development plans, sales data, market shares or other competitive information.
- Never engage in discussions that may lead to the coordination of competitive behaviour and make sure that agendas and discussion points at e.g. trade associations meetings do not include matters that are competitively sensitive.
- Never impose fixed or minimum resale prices on our distributors and wholesalers and involve Corporate Legal or a local legal advisor before imposing competition clauses, exclusivity arrangements or territorial restrictions.
- Pay special attention not to apply any kind of behaviour that could be abusive in markets where Lundbeck holds a Dominant Position.
- Think carefully when communicating about competitive aspects and avoid language that could imply an abusive motive or intent.
- Always involve Corporate Legal, if issues that may affect competition are brought up by competitors, authorities, distributors, Suppliers or Third Parties.



# CONFIDENTIAL INFORMATION AND INSIDE INFORMATION

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*We understand the importance of protecting Confidential Information including Inside Information. We continuously act to protect our assets and proprietary information, prevent the unauthorised disclosure of this information and prevent insider trading.*

## LUNDBECK WILL ENSURE THAT

- Security policies and procedures are in place to protect and prevent the unauthorised disclosure of Confidential Information.
- Advice on handling Confidential Information is available to our employees.
- Tools and guidance, including agreements containing Lundbeck's standard requirements, are in place to help employees protect Confidential Information.
- Systems and processes that are compliant with applicable stock exchange regulations are in place to prevent insider trading in securities.
- Our employees are familiar with applicable stock exchange regulations on insider trading.

## YOU ARE EXPECTED TO

- Consider whether information is confidential before disclosing it.
- Be responsible for the proper use and protection of Confidential Information.
- Never disclose proprietary or Confidential Information to anyone outside Lundbeck without executing a secrecy agreement approved by Corporate Legal or local legal counsel.
- Never trade in Lundbeck shares or shares of another company based on Inside Information.
- Never pass on Inside Information to any other person or encourage anyone to trade based on Inside Information.
- Immediately contact Corporate Legal if you detect or suspect any unauthorised disclosure of Inside Information.



# PATIENT SAFETY

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*We acknowledge our responsibility to people who depend on our products and knowledge to safely manage their disease. We produce high quality products, perform Pharmacovigilance, continuously evaluate the benefits and risks of our products and take proactive action as warranted.*

## LUNDBECK WILL ENSURE THAT

- Our Pharmacovigilance systems are continuously developed to meet applicable laws and regulations in regard to our medicinal products, clinical and animal research activities.
- We provide timely reports on Adverse Events or Special Situations and subsequently engage proactively in dialogue with the relevant Regulatory Authority and other key Stakeholders.
- The required information to patients on the safe use of products for which Lundbeck holds the Marketing Authorisation is traceable and kept up to date.
- Our global Pharmacovigilance service provides around the clock assistance to handle reported Adverse Events.
- We work within our sphere of influence to fight Counterfeit Medicine that threatens the health and well-being of our patients.

## YOU ARE EXPECTED TO

- Describe any suspected Adverse Events or Special Situations on our medicinal products that are brought to your direct attention as a company representative and immediately forward this information to the local Pharmacovigilance manager or to Global Pharmacovigilance via [safety@lundbeck.com](mailto:safety@lundbeck.com).
- Advise persons experiencing suspected Adverse Events or Special Situations relating to Lundbeck Medicinal Products to contact their physician.
- Immediately report any product complaint and information about suspected or actual Counterfeit Medicine to the local Quality Responsible Person or by sending it to [complaint@lundbeck.com](mailto:complaint@lundbeck.com).



# INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND PATIENTS

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*We believe our interactions with Healthcare Professionals, Healthcare Organisations, patients and Patient Organisations have a profound and positive influence on the quality of patient care and the value of future research. These interactions are well-regulated and we are committed to enhancing transparency.*

## LUNDBECK WILL ENSURE THAT

- We engage with Healthcare Professionals, Healthcare Organisations, patients and Patient Organisations for legitimate reasons and in accordance with the regulations that apply to the organising Lundbeck entity, the participants and where the interaction takes place.
- Procedures and systems are in place to enable a documented review and approval of these interactions and disclose relevant Transfers of Value in accordance with applicable regulations.
- Any fee for the provided services represents a Fair Market Value.
- Only appropriate locations and venues that are conducive to the professional purpose of the Events are selected or sponsored.
- All expenses for Events, Informational and Educational Items are kept reasonable to prevent any inappropriate influence.
- Relevant training is provided and monitoring is performed to ensure that Lundbeck procedures and applicable local regulations are observed.
- Third Parties who interact with Healthcare Professionals, Healthcare Organisations, patients or Patient Organisations for Lundbeck are instructed to act in accordance with our procedures and applicable local regulations.

## YOU ARE EXPECTED TO

- Be able to document the legitimate need for and the professional purpose of interactions with Healthcare Professionals, Healthcare Organisations, patients and Patient Organisations.
- Ensure that any interaction is free of Conflict of Interest, that a written agreement is in place before the commencement of any collaboration or fee for service arrangement and that the compensation offered reflects the Fair Market Value.
- Ensure that the programme, location, venue and related hospitality of any event are reviewed and approved in accordance with Lundbeck procedures and any additional local regulations.
- Ensure that no entertainment, leisure or social activities are included when organising or sponsoring Events and that no spouses, family members or other companions are invited.
- Ensure that no Gifts or Promotional Aids are provided to Healthcare Professionals.
- Keep the costs reasonable and only pay for travel, meals, accommodation and registration fees, if you are permitted by local laws and regulations to invite participants for Events.
- Only offer inexpensive Informational or Educational Items that are permitted by local laws and regulations.
- Record, report and disclose relevant Transfers of Value according to Lundbeck's procedures and any additional local regulations.



# ANIMAL RESEARCH

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*We are obliged to conduct experiments on animals to ensure patients receive safe and effective medicine. We provide appropriate care for our experimental animals and we continuously work to improve our animal research policy and procedures as well as our animal facilities.*

## LUNDBECK WILL ENSURE THAT

- Our animal research policy and procedures comply with applicable laws, guidelines and licenses, and are subjected to an ethical review on a regular basis.
- All employees working with animals uphold documented and appropriate training.
- Laboratory animal veterinary staff are on call and available to ensure animal welfare and appropriate treatment of ailments.
- Employees are acknowledged for initiatives that refine, replace or reduce the use of animals and for exceptional animal care.
- Contract research organisations and laboratories working on our behalf as well as Suppliers of animals are closely audited and live up to our ethical standards.
- Trends within laboratory animal science are closely monitored, carefully evaluated and implemented when appropriate.
- Data on animal use is reported to the relevant authorities.
- Required data from animal research is collected and promptly reported to the relevant Regulatory Authority, if the data suggest a significant risk to humans.

## YOU ARE EXPECTED TO

- Be familiar with Lundbeck's approach to animal research expressed in this Code of Conduct.
- Follow Lundbeck's policy and procedures for animal research, including that you have received the appropriate training.
- Ensure that any use of research animals is carried out in accordance with a formal research protocol and the results are reported in writing.
- Work continuously to refine, replace and reduce the use of animals.
- Contact your manager, laboratory animal veterinary staff or Lundbeck's Compliance Hotline, if you have concerns regarding animal welfare.



# CLINICAL RESEARCH

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*We conduct clinical research activities in accordance with international guidelines, Good Clinical Practice and ethical standards that meet international requirements. We provide the public with information about our Clinical Studies while they are ongoing and disclose the results when the studies have been completed.*

## LUNDBECK WILL ENSURE THAT

- Our clinical research activities are regulated through procedures that comply with current international requirements and regulations.
- Our employees have been trained in relevant study procedures prior to being involved in clinical research.
- Investigators, contract research organisations and study sites are carefully selected, trained and audited to secure safe study conduct.
- Publication activities are undertaken in a responsible and ethical manner, to ensure that all relevant information is communicated clearly and in a timely way.
- Information on and the results of all interventional clinical phase II-IV studies are publicly disclosed regardless of the outcome without omission of relevant data and in accordance with Personal Data regulations.
- Required Clinical Data are collected and promptly reported to the relevant Regulatory Authority.
- Participants in our studies are protected by the same basic rights, ethical standards and international regulations regardless of where in the world the study is being conducted.
- We strive to conduct our clinical research in countries where we or our partners intend to market the product.
- Clinical assessments, post-marketing surveillance or post-authorisation studies are conducted with a strictly scientific purpose.

## YOU ARE EXPECTED TO

- Observe and follow Lundbeck's procedures for clinical research.
- Only engage in Clinical Studies, if it is part of your job and you are trained and authorised to do so.
- Avoid participation as a Study Subject or Investigator in interventional Clinical Studies sponsored by Lundbeck.
- Always ensure that Study Subjects' rights, safety and integrity are protected.
- Observe and follow Lundbeck's procedures and any applicable local requirements for Study Subject data handling and protection.
- Observe and follow Lundbeck's Clinical Studies disclosure and publication policies for transparency of clinical research.



# PROMOTIONAL ACTIVITIES

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*We acknowledge that the Promotion of medicinal products is strictly regulated and monitored by authorities and we are committed to complying with applicable regulations. We maintain processes and provide extensive training to ensure that promotional activities are appropriately evaluated and approved.*

## LUNDBECK WILL ENSURE THAT

- Our employees and Third Parties that perform informational or promotional activities are trained to comply with applicable laws, regulations and Lundbeck procedures.
- Procedures and systems are in place to ensure that promotional activities provide current, fair, accurate, balanced, objective and sufficiently complete information on the product.
- Promotion only takes place for products for which Lundbeck or a partner company holds a Marketing Authorisation or as permitted by the regulatory authorities and only for indications consistent with the approved Product Label.
- Lundbeck Medicinal Product Samples generally are provided upon request in accordance with local laws and regulations and with written receipt by Healthcare Professionals.
- Our communication on websites, social media and digital channels complies with applicable laws and regulations.

## YOU ARE EXPECTED TO

- Never offer any benefits in exchange for prescribing, recommending, purchasing, supplying or administering medicinal products.
- Only offer inexpensive Informational or Educational Items that are permitted by local laws and regulations, and ensure that no Promotional Aids are provided.
- Only use promotional material that has been subjected to a medical, regulatory and legal approval.
- Only use promotional materials that are updated, complete and clearly give references to the sources of information.
- Only carry out Promotion of products that have a valid Marketing Authorisation in the country where you operate.
- Never engage in Off-label promotional activities.
- Only provide Off-label information if required in response to a specific request from a Healthcare Professional, as a non-promotional activity and in accordance with applicable local laws, regulations and local Lundbeck procedures.
- Ensure that all Medicinal Product Samples provided to Healthcare Professionals are controlled and can be accounted for.
- Ensure that your Personal Social Media Activities do not include any mention of medicinal products by brand name, generic name, molecule name, project name, visuals or imagery.



## DONATIONS AND GRANTS

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*We occasionally provide Donations and Grants to confirm our responsibility towards society and contribute to promoting access to health for people living with brain disease. Our processes for assessing requests are designed to ensure that contributions are provided without obtaining any benefits in return.*

### LUNDBECK WILL ENSURE THAT

- Donations and Grants are provided according to Lundbeck's procedures and any additional local requirements for purposes that are legitimate and legal, and benefit patients, healthcare, research or take the form of charity.
- Donations and Grants only are provided upon request from the potential recipient, except if they are provided for charity or research.
- Donations and Grants only are provided to Eligible Recipients and without the expectation of receiving any benefits in return.
- Donations and Grants are documented and specify the recipient, purpose, timeframe and the provided value.
- Procedures are in place to establish a local threshold of a significant value for Donations and Grants to ensure proper follow-up.
- Lundbeck Medicinal Products only are donated as a time limited activity, when these would not be accessible to the recipient otherwise and not in any way as part of a promotional activity.

### YOU ARE EXPECTED TO

- Manage Donations and Grants according to Lundbeck's procedures and any additional local requirements.
- Never offer Donations and Grants with the expectation of receiving any benefits in return.
- Request a written statement from recipients of Donations and Grants of a significant value that confirms the contribution was used for the intended purpose.
- Document and retain all requests, assessments and responses as well as actual agreements and the relevant confirmations of the provided Donations or Grants.
- Ensure that requests for Donations of Lundbeck Medicinal Products are directed to the dedicated section of Lundbeck's corporate website.
- Ensure that all Donations and Grants are recorded in our accounts and publicly disclosed as required by local regulations.





H. Lundbeck A/S  
Ottiliavej 9  
2500 Valby

Corporate Compliance & Sustainability  
[compliance@lundbeck.com](mailto:compliance@lundbeck.com)